

2013 DEC 17 AM 8:22  
CLERK OF COURT  
ADAMS COUNTY

STATE OF INDIANA )  
COUNTY OF ADAMS ) SS:

IN THE ADAMS COUNTY SUPERIOR COURT

CAUSE NO: 010011312 CT 0008

CHARLES MARLEY,  
Plaintiff,

vs.

TRACTOR SUPPLY COMPANY,  
Defendant.

COMPLAINT

COMES now the Plaintiff, Charles Marley, by counsel, and for his Complaint for Damages against the Defendant, Tractor Supply Company, alleges and asserts that:

1. Plaintiff, Charles Marley, ("Plaintiff") is an individual and is now, and at all times mentioned in this complaint was, a resident of Red Key, Jay County, Indiana.
2. Defendant, Tractor Supply Company is now, and at all times mentioned in this complaint was, a corporation doing business within and under the laws of the State of Indiana.
3. Plaintiff was an employee of Tractor Supply Company for a period of time up to and including September 18, 2012.
4. Specifically Plaintiff was employed as a manager of the Tractor Supply Company retail store located at 829 South 13<sup>th</sup> Street, Decatur, Indiana 46733.
5. During the relevant period of time, Tractor Supply Company employed an individual by the name of Jenny Brooks.

6. At all relevant periods of time, Jenny Brooks was an agent and/or employee of Tractor Supply Company.

7. During Plaintiff's employment, the Defendant by and through its agents and/or employees including but not limited Jenny Brooks accused Plaintiff of sexual harassment and/or retaliation of its employee Jenny Brooks.

8. This accusation of sexual harassment was communicated by the Defendant by and through its agents and/or employees to employees of the Defendant in addition to individuals outside the employ of Defendant.

9. This accusation of sexual harassment and retaliation was communicated by the Defendant by and through its agents and/or employees to potential employers of the Plaintiff.

10. The entire statement that the Plaintiff was guilty of sexual harassment and retaliation is false as it pertains to Plaintiff.

11. The entire statements that the Plaintiff was guilty of sexual harassment and retaliation is defamatory and libelous on its face. It clearly exposes Plaintiff to hatred, contempt, ridicule and humiliation.

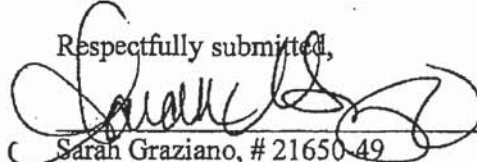
12. As a proximate result of the above-described accusations and communication of sexual harassment and retaliation, Plaintiff has suffered loss to his reputation, his good name, his work ethic, experienced shame, mortification, and injury to his emotional, physical, and financial wellbeing.

13. The above-described accusations and communications by the Defendant was done with malice, hatred and ill will toward Plaintiff thus entitling the Plaintiff to punitive damages.

WHEREFORE, the Plaintiff, Charles Marley, prays that the Court grant judgment against the Defendant, Tractor Supply Company, in an amount commensurate with his damages

including but not limited to all compensatory damages, interest, punitive damages, for the costs of this action, and for all other relief just and proper in the premises.

Respectfully submitted,



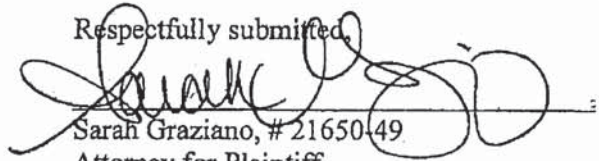
Sarah Graziano, # 21650-49  
Attorney for Plaintiff

**HENSLEY LEGAL GROUP, PC**  
350 E. New York Street, Suite 300  
Indianapolis, IN 46204  
(317) 472-3333 Phone  
(317) 472-3340 Facsimile  
sgraziano@hensleylegal.com

**REQUEST FOR TRIAL BY JURY**

COMES now the Plaintiff, Charles Marley, by counsel and files herein his request for trial by jury for the above action.

Respectfully submitted,



Sarah Graziano, # 21650-49  
Attorney for Plaintiff

**HENSLEY LEGAL GROUP, PC**  
350 E. New York Street, Suite 300  
Indianapolis, IN 46204  
(317) 472-3333 Phone  
(317) 472-3340 Facsimile  
sgraziano@hensleylegal.com